

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. 1236 & 1377**

**SUPPLEMENTAL CERTIFICATION OF COUNSEL REGARDING  
ORDER APPROVING STIPULATION REGARDING ENTRY  
INTO LEASE TERMINATION AGREEMENT**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On January 20, 2025, the Debtors filed the *Certification of Counsel Regarding Order Approving Stipulation Regarding Entry Into Lease Termination Agreement* [D.I. 1783], seeking entry of an order approving the *Stipulation Regarding Entry Into Lease Termination Agreement* attached thereto.

2. At a hearing held on January 21, 2025, the Court directed the Debtors to share the proposed form of order (the “**Proposed Order**”) with counsel to Aldi Inc., which the Debtors promptly did on January 21 after the hearing.

3. The Debtors have not received a response from Aldi’s counsel as of the filing hereof.

---

<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form filed at D.I. 1783, at its earliest convenience.

Dated: January 22, 2025  
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Sophie Rogers Churchill  
Robert J. Dehney, Sr. (No. 3578)  
Andrew R. Remming (No. 5120)  
Daniel B. Butz (No. 4227)  
Tamara K. Mann (No. 5643)  
Sophie Rogers Churchill (No. 6905)  
1201 N. Market Street, 16<sup>th</sup> Floor  
Wilmington, DE 19801  
Tel: (302) 658-9200  
[rdehney@morrisnichols.com](mailto:rdehney@morrisnichols.com)  
[aremming@morrisnichols.com](mailto:aremming@morrisnichols.com)  
[dbutz@morrisnichols.com](mailto:dbutz@morrisnichols.com)  
[tmann@morrisnichols.com](mailto:tmann@morrisnichols.com)  
[srchurchill@morrisnichols.com](mailto:srchurchill@morrisnichols.com)

-and-

DAVIS POLK & WARDWELL LLP

Brian M. Resnick (admitted *pro hac vice*)  
Adam L. Shpeen (admitted *pro hac vice*)  
Stephen D. Piraino (admitted *pro hac vice*)  
Ethan Stern (admitted *pro hac vice*)  
450 Lexington Avenue  
New York, NY 10017  
Tel.: (212) 450-4000  
[brian.resnick@davispolk.com](mailto:brian.resnick@davispolk.com)  
[adam.shpeen@davispolk.com](mailto:adam.shpeen@davispolk.com)  
[stephen.piraino@davispolk.com](mailto:stephen.piraino@davispolk.com)  
[jonah.peppiatt@davispolk.com](mailto:jonah.peppiatt@davispolk.com)  
[ethan.stern@davispolk.com](mailto:ethan.stern@davispolk.com)

*Counsel to the Debtors and Debtors in Possession*